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**MINUTES FROM FEBRUARY 18, 1993 OPERABLE
UNIT MEETING**

02/26/93

DOE-FN/EPA

DOE-1233-93

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LETTER



Department of Energy
Fernald Environmental Management Project
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FEB 26 1993
DOE-1233-93

Mr. James A. Saric, Remedial Project Director
U.S. Environmental Protection Agency
Region V - 5HRE-8J
77 W. Jackson Boulevard
Chicago, Illinois 60604-3590

Mr. Graham E. Mitchell, Project Manager
Ohio Environmental Protection Agency
40 South Main Street
Dayton, Ohio 45402-2086

Dear Mr. Saric and Mr. Mitchell:

MINUTES FROM FEBRUARY 18, 1993 OPERABLE UNIT 3 MEETING

The purpose of this letter is to transmit, for your information, meeting minutes from the February 18, 1993, meeting between Department of Energy, Fernald Field Office (DOE-FN), United States Environmental Protection Agency (U.S. EPA) and Ohio Environmental Protection Agency (OEPA) on the Interim Record of Decision and the Remedial Investigation/Feasibility Study (RI/FS) Work Plan Addendum for Operable Unit 3. The objective of these meeting minutes is to both outline the issues which were discussed and document the actions committed to by both Department of Energy (DOE) and EPA.

If you or your staff have any questions or comments, please contact Robert Janke at 513-738-6883.

Sincerely,

for Jack R. Craig
Fernald Remedial Action
Project Manager

FN:RJJanke

Enclosure: As Stated

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cc:

J. J. Fiore, EM-42, TREV
K. A. Hayes, EM-424, TREV
B. Barwick, USEPA-V, 5CS-TUB-3
G. Jablonowski, USEPA-V, AT-18J
J. Kwasniewski, OEPA-Columbus
P. Harris, OEPA-Dayton
M. Proffitt, OEPA-Dayton
T. Schneider, OEPA-Dayton
J. Michaels, PRC
L. August, GeoTrans
R. L. Glenn, Parsons
P. Clay, FERMC0/19
D. Dubois, FERMC0/65-2
J. W. Thiesing, FERMC0/2
AR Coordinator, FERMC0

MEETING MINUTES**OU 3 MEETING WITH U.S. EPA AND OHIO EPA AT THE PALMER
HOUSE, CHICAGO****FEBRUARY 18, 1993**

The meeting covered two topics: U.S. and Ohio EPA comments on the outline for the proposed plan for the interim Record of Decision and Comments on the December 1992 draft of the OU 3 Work Plan Addendum. In attendance were representatives of DOE-FN, DOE-HQ, U.S. EPA, OEPA, FERMCO, ANL, PRC and Booz-Allen.

<u>Name</u>	<u>Organization</u>	<u>Phone</u>
Mike Davis	Argonne National Lab	(708) 252-7697
Matt Porter	Booz-Allen, For DOE-HQ	(301) 540-0971
Dave Yockman	DOE-HQ	(301) 903-7632
Jack R. Craig	DOE-FN	(513) 738-6159
Robert Janke	DOE-FN	(513) 738-6883
Todd R. Clark	FERMCO - CRU 3-FS	(513) 738-6603
George Latulippe	FERMCO - CRU 3 RI/FS	(513) 738-9441
Jim King	FERMCO - CRU 3	(513) 738-9460
Dennis Dalga	FERMCO - CRU 3 RI/FS Planning	(513) 738-9148
Mike Strimbu	FERMCO - Regulatory Programs	(513) 738-9489
Graham Mitchell	Ohio EPA	(513) 285-6018
Jerry McLane	PRC EMI, For U.S. EPA	(312) 856-8759
Theresa Gioia	PRC, EMI, For U.S. EPA	(708) 255-4166

Jim Saric U.S. EPA (312) 886-0992

Gene Jablonowski U.S. EPA-Radiation Sect. (312) 886-0169

Proposed Plan Outline

Major Points

- USEPA accepted the use of existing data in a "qualitative" assessment of short-term risks associated with D&D. No new data are needed to support the analysis.
- Both US and Ohio EPA appear to support (encourage?) the removal of contaminated materials from the site consistent with existing programs, removal actions, etc. as a part of the interim action. DOE stated that such actions could bias the final waste disposal decisions for the site.
- USEPA suggests an interim ROD date in the fall (about October 1993), assuming a draft proposed plan in the April/May time frame. The proposed plan will be a primary document although USEPA indicated that it should be able to complete a review in 30 days. USEPA wants a schedule for the draft document by next week. USEPA does not want/expect to see a document larger than 100 pages.
- USEPA stated that an IROD is "less acceptable" if the use of an IROD does not accelerate the final ROD.
- Discussion of criteria for the release of material from the site without radiological restriction suggests that this issue is not totally resolved, although USEPA appeared to accept the use of NRC criteria for surface contamination for release limits for use with non-porous materials.

Other Comments

- It was agreed that the title of the document will be "proposed plan" only and will not include any mention of a feasibility study.
- USEPA wants a qualitative discussion of environmental controls that will be in place during D&D. For example, Subjects such as fugitive emission control should be addressed qualitatively in the Proposed Plan, not detailed until the RD/RA work plan.
- The document needs to discuss how the interim action will be integrated with other activity in OU 3 and the site (need to provide overall picture).

- USEPA wants consistency of discussion of the release of material from the site. They want an integration of disposition of materials with removal actions. See major point above.
- USEPA expressed a desire to have the proposed plan follow the outline in the USEPA guidance. DOE proposed possible deviations to the guidance outline based on the complexities of Operable Unit 3 and the ongoing RI/FS.
- USEPA wants the discussion of screening of alternatives dropped and all three alternatives carried through the detailed analysis.
- It was agreed that a discussion of Ohio's acceptance of alternatives will be included in the final proposed plan in the detailed evaluation of alternatives on the basis of Ohio's comments during review of the draft document.
- It was agreed that a specific section will be included in the proposed plan that identifies the preferred alternative.

Action Items

- DOE will submit a schedule for the IROD document in 30 days.
- DOE will submit a schedule for the draft document next week.

Comments on the Work Plan Addendum

Major Points

- USEPA noted that although the revised document was disapproved, USEPA and DOE will not initiate dispute resolution.
- USEPA appears to have disapproved the WPA on the basis of "conflicting" objectives and various other issues (generally misunderstandings) raised in their comments that seem to have been resolved in the meeting.
- A comment-by-comment discussion suggests that all issues raised in the comments are resolvable.
- DOE emphasized that screening data or data collected in the RI program will not be used to make any decisions about the release of material from the site without radiological restrictions. This appeared to have been a

- DOE indicated that all components will be surveyed before sampling decisions are finalized for all components.
- There appears to be no fundamental objections from the EPAs to the sampling approach proposed.
- Comment responses need to include details on how revisions will be made.
- USEPA wants to see the sampling procedures (including the rad survey and Health & Safety procedures), and emphasized that these need to be in the SCQ (and approved) prior to sampling. It was agreed by USEPA that DOE should submit the Field Sampling Procedures with the Comment Responses in order to expedite their review and approval.

Other Comments

- USEPA wants more discussion of the overall approach at the beginning of work plan addendum.
- Contrary to comments, it now appears acceptable to USEPA to provide generic summaries concerning common sampling issues rather than provide repeated discussion by component. Only exceptions need to be noted.
- The use of screening data to classify buildings appears to be acceptable to USEPA.

Action Item

- Response to comments will be provided by DOE in 30 days including:
 - Detailed responses
 - Sampling procedures
 - Revised FWP for Building 39A
 - Proposed changes to WPA to reflect IROD
 - Streamlining approach reflecting; such as deletion of ISA and revised schedule
 - A revised work plan addendum will be issued following the USEPA & OEPA approval of the response to comments. No commitment date has been established for the resubmittal of the second revision to EPA.

USEPA Action Item:

- USEPA/PRC will provide the correct table citation for General Comment #12 on the Work Plan.